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PASTOR, BEHLING & WHEELER, LLC  
2201 Double Creek Drive, Suite 4004  
Round Rock, TX 78664

Tel (512) 671-3434  
Fax (512) 671-3446

August 13, 2007  
(PBW Project No. 1381)

VIA OVERNIGHT COURIER

Mr. Gary Miller  
Superfund Division, Region 6 (6SF-AP)  
Arkansas/Texas Section  
U.S. Environmental Protection Agency  
1445 Ross Avenue, Suite 1200  
Dallas, Texas 75202-2733

Re: July 2007 Monthly Status Report, Gulfco Marine Maintenance Site, Freeport, Texas

Dear Mr. Miller:

Pursuant to Section XII, Paragraph 53 of the modified Unilateral Administrative Order (UAO) for the above-referenced Site, Pastor, Behling & Wheeler, LLC (PBW) has prepared this monthly status report on behalf of LDL Coastal Limited LP (LDL), Chromalloy American Corporation (Chromalloy) and The Dow Chemical Company (Dow) (collectively referred to as Respondents in the UAO and the Statement of Work (SOW) attached thereto). As discussed in our telephone conversation on August 2, 2005, monthly status reports for a given month will be submitted by the 15<sup>th</sup> of the following month as required in Paragraph 53 of the UAO, rather than by the 10<sup>th</sup> of the following month as indicated in Appendix 1 of the UAO. In accordance with the UAO requirements this report addresses the topics listed below:

1. Actions which have been taken toward achieving compliance with the UAO during the previous month – The following actions were taken during the previous month:
  - RI/FS site characterization activities (SOW Paragraphs 34 through 36) detailed under Task 6 of the RI/FS Work Plan including:
    - Subtask 6.3 – Laboratory analyses of soil samples from five background locations within the City of Freeport right-of-way immediately south of Marlin Avenue were completed. Validation of the data from these analyses was partially completed.
    - Subtask 6.5 – Laboratory analyses of Phase 2 groundwater samples, and a soil sample from the boring for monitoring well ND3MW29 were completed. Validation of the data from these analyses was partially completed.
    - Subtask 6.8 – The pathway-specific risk assessment for the fish ingestion pathway submitted to EPA on March 20, 2007 was revised to incorporate EPA comments provided on June 29, 2007. The revised risk assessment was submitted on July 18, 2007.

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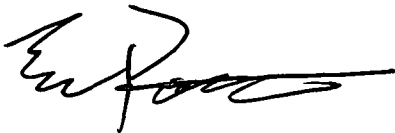


2. Results of sampling, tests, modeling and all other data (including raw data) received or generated by or on behalf of Respondents during the previous month – The following data were received or generated during the previous month:
  - Unvalidated analytical laboratory reports for the background soil sample analyses described above are provided in electronic form on the enclosed DVD.
  - Unvalidated analytical laboratory reports for the Phase 2 groundwater sample analyses described above are provided in electronic form on the enclosed DVD.
  - Unvalidated analytical laboratory reports for the soil sample from the boring for monitoring well ND3MW29 analyses described above are provided in electronic form on the enclosed DVD.
3. Actions, data and plans which are scheduled for the next two months and other information relating to the progress of work – The following actions are planned for the next two months:
  - RI/FS site characterization activities (SOW Paragraphs 34 through 36) detailed under Task 6 of the RI/FS Work Plan (weather and access permitting) including:
    - Subtask 6.3 – Soil investigation – to be continued through analytical data validation, and data evaluation.
    - Subtask 6.5 – Groundwater/NAPL investigation – to be continued through analytical data validation, and data evaluation.
    - Subtask 6.6 – Surface water investigation – to be continued through analytical data evaluation.
    - Subtask 6.7 – Sediment investigation – to be continued through analytical data evaluation.
4. Information regarding percentage of completion, all delays encountered or anticipated that may affect the future schedule for completion of the work required, and efforts made to mitigate those delays or anticipated delays – RI/FS activities are approximately 50% complete. No delays were encountered this month.

Thank you for the opportunity to submit this status report. Should you have any questions, do not hesitate to contact me.

Sincerely,

PASTOR, BEHLING & WHEELER, LLC



Eric F. Pastor, P.E.  
Principal Engineer

Attachments

Mr. Gary Miller  
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cc: Mr. Doug McReynolds – EA Engineering, Science and Technology  
Ms. Luda Voskov – Texas Commission on Environmental Quality  
Mr. Robert L. Iuliucci - Sequa Corporation  
Mr. Brent Murray – Environmental Quality, Inc.  
Mr. Rob Rouse - The Dow Chemical Company  
Mr. Allen Daniels - LDL Coastal Limited, LP  
Mr. F. William Mahley - Strasburger & Price, LLP  
Mr. James C. Morriss III - Thompson & Knight, LLP  
Ms. Elizabeth Webb - Thompson & Knight, LLP